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November 1, 2024

**VIA ECF-PACER**

Magistrate Judge Miroslav Lovric  
United States District Court  
Northern District of New York  
Federal Building and U.S. Courthouse  
15 Henry Street  
Binghamton, New York 13901

Re: *Adirondack Trust Company v. Maha Laxmi Corp., et. al.*  
1:21-cv-01334-DNH-ML (N.D.N.Y.)

Dear Judge Lovric:

This firm represents Plaintiff Adirondack Trust Company (“ATC”) in the above-referenced matter. We write to provide an update to the Court concerning the editing of ATC’s Wikipedia page (Dkt. 111- 116).

On October 31, 2024, I received an emailed letter from Rahul Jain, who claims to have edited ATC’s Wikipedia page as referenced in our October 25, 2024 correspondence to the Court (Dkt. 111). A copy of this letter is attached as **Exhibit A**. Mr. Jain acknowledges using a pseudonym to edit ATC’s Wikipedia page in the past and implies that he sent the email to Charles Wait, Jr., ATC’s President and CEO, from the Leroy Brown posteo account. Notably, Mr. Jain also admits that he has some relationship with Niral Patel (stating that he is a “private citizen with little relationship to Niral A. Patel”). Mr. Jain also expressly threatens to sue ATC, Mr. Wait, my firm and me. Mr. Jain claims that he has not communicated with Mr. Patel or his associates regarding any of his actions.

ATC has not yet received the sworn affidavit from Niral Patel regarding his involvement and/or knowledge of the Wikipedia edits (Dkt. 114). Upon receipt of that affidavit, ATC will determine whether it will request permission to: (1) serve a subpoena on Wikipedia; (2) conduct a forensic examination of Mr. Patel’s devices; and/or (3) seek discovery from Mr. Jain.<sup>1</sup>

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<sup>1</sup> Any such discovery would be separate and apart from the fact discovery in this matter, which the parties have completed.

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Please contact me if the Court has any questions.

Respectfully,



Christopher E. Buckey

cc: All Counsel of Record (via ECF-PACER)